

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
FOLLOW-UP INTERROGATORY TO
UNITED STATES POSTAL SERVICE WITNESS DONALD J. O'HARA
(OCA/USPS-T30-10)
September 22, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

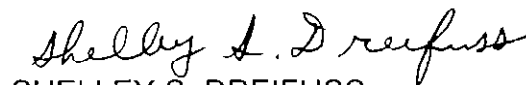
Respectfully submitted,

for

GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS


Attorney

OCA/USPS-T30-10. This interrogatory follows up on witness Moden's response to interrogatory DMA/USPS-T4-42b, in particular, to his statement: "[M]ail with a window of requested in-home dates may be curtailed consecutive days." (Witness Moden's earlier response to interrogatory DMA/USPS-T4-21b establishes that the curtailment statement applies "100 percent" to Standard A mail.)

- a. Do you agree that curtailing mail for a period of time for the convenience of the mailer, i.e., so that a delivery window can be met, increases the "value of the mail service . . . to . . . the sender" under subsection 3622(b)(2)? If you do not agree, please explain.
- b. You indicate in your testimony, at 32-33, that "due to its deferability," Regular and other Standard subclasses have a "relatively low value of service." But has the curtailment of Standard Mail A at the request of the mailer and for the mailer's advantage caused you to increase Standard Mail A subclasses' cost coverages?
 - i. If so, please provide a citation to your testimony and/or workpapers where you have explicitly increased the cost coverage of the Standard Mail A subclasses in recognition of this benefit.
 - ii. If not, why did not this benefit influence you to propose a somewhat higher cost coverage for Standard Mail A subclasses?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY S. DREIFUSS
Attorney

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